

REMARKS

Claims 1-26 are pending in the application.

Claims 1-26 are rejected.

Claims 1-26 are rejected under 35 U.S.C. 103(a).

Claims 1-26 remain in the case for consideration.

Applicant requests reconsideration and allowance of the claims in light of the following remarks.

Claim Rejections – 35 U.S.C. § 103

Claims 1-26 are rejected under 35 U.S.C. 103(a) as being unpatentable over Background of the Invention in view of U.S. Patent No. 6,552,426 to Ishio, et al., in view of Koopmans (6,706,557) and further in view of Lin (6,333,562).

Applicants respectfully traverse the rejections.

Claims 1, 10, 17 and 26 each recite an insulating *tape* (63b). This element is supported, among other locations, on page 5, lines 13-14. Also, *The American Heritage® Dictionary of the English Language, Third Edition* (copyright © 1992 by Houghton Mifflin Company) defines *tape* as “[a] continuous narrow, flexible strip of cloth, metal, paper, or plastic, such as adhesive tape, magnetic tape, or ticker tape.” These are inherent properties of tape.

Ishio teaches away from a tape-type material as an insulating tape attached to a top chip. In the office action mailed 3/22/05, the Examiner states that Ishio’s first insulating film (3) corresponds to the insulating tape 63b of the claimed invention. Ishio’s insulating film (3), however, is made of a SiN film and a polyimide film (Col. 5, line 65). These materials may not be considered a “tape”, as recited in the claims of the instant application, because they are materials that are grown on a substrate, whereas a “tape” is a distinct layer that is not grown on the surface to which it is applied.

For at least this reason, the cited references, either alone or in combination, do not teach or suggest all of the limitations of claims 1, 10, 17 and 26. Accordingly, the rejection does not present a *prima facie* case of obviousness, and the applicants submit that these claims are allowable.

Claims 2-9, 11-16 and 18-25 depend from their respective base claims 1, 10 and 17 and inherently include all of the limitations of their base claim. As discussed above, the prior art does not teach the limitations of the base claim much less the further embodiments of the

dependent claims. Therefore, claims 2-9, 11-16 and 18-25 are allowable for their dependency and their own merits. Allowance of these claims is requested.

Interview Summary

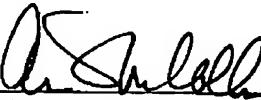
Applicants thank the Examiner for her time during the telephone interview that was conducted between the Examiner and Applicant's representative, Brian Wichner, on May 11, 2005. During that interview, Applicant's representative stated that the Ishio reference does not teach or disclose, among other things, an insulating tape. Applicants also proposed claim amendments to further distinguish the claims from Ishio. Agreement between the Examiner and the Applicants was not reached during the interview.

Conclusion

For the foregoing reasons, reconsideration and allowance of claims 1-26 of the application as amended is solicited. The Examiner is encouraged to telephone the undersigned at (503) 222-3613 if it appears that an interview would be helpful in advancing the case.

Respectfully submitted,

MARGER JOHNSON & McCOLLUM, P.C.



Alan T. McCollom
Reg. No. 28,881

MARGER JOHNSON & McCOLLUM, P.C.
1030 SW Morrison Street
Portland, OR 97205
503-222-3613
Customer No. 20575

I hereby certify that this correspondence is being transmitted to the U.S. Patent and Trademark Office via facsimile number (703) 872-9306 on June 9, 2005.



Li Mei Vermilya